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 Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

ANGELA D. S.

Plaintiff,

v.

KILOLO KIJAKAZI, ACTING
 COMMISSIONER OF SOCIAL SECURITY,

Defendant.

CASE NO.

2:23-cv-00888-CDS-NJK

**SECOND UNOPPOSED MOTION
 FOR EXTENSION OF TIME TO FILE
 PLAINTIFF'S BRIEF**

Plaintiff by her attorney, moves for a fourteen (14) day extension of time to file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed on or before November 6, 2023. If this motion is granted, Plaintiff's deadline to file her Brief would be extended to November 20, 2023. This is Plaintiff's second request for an extension of time in this matter. On September 5, 2023, this Court granted Plaintiff's first Motion for an Extension of Time (Dkt. No. 13).

Counsel is acting as Local Counsel to Olinsky Law Group. However, in an effort to provide a complete record to the court, Olinsky Law Group desires to seek admission *Pro Hac Vice* for Amanda Tilley-Beeler, Esq., who is the assigned drafting attorney for Olinsky Law Group in this matter. Counsel is preparing and compiling the requisite documents to file an application for admission *Pro Hac Vice* for Ms. Tilley-Beeler. In accordance with LR IA 11-2,

1 Counsel must contact Plaintiff to secure her written consent to Counsel for this purpose. Further,
2 in accordance with LR IA 11-2 (b)(3), Counsel must request a Certificate of Good Standing from
3 the South Carolina State Supreme Court, the request must be made via mail, and the Certificate
4 of Good Standing must be returned to Counsel via mail. Once the requisite documents are
5 received, Counsel will promptly file her application to appear *Pro Hac Vice*.
6

7 Wherefore, Plaintiff requests an extension from November 6, 2023, up to and including
8 November 20, 2023 to file their brief. Counsel does not request this extension with any intention
9 to delay this case but to desires to proceed in a manner that complies with all pertinent rules.
10 Counsel for the Plaintiff has conferred with Defendant's Counsel, who has no objection to this
11 request.
12

13 Dated November 3, 2023.

14 Respectfully submitted,

15 /s/Hal Taylor

16 Hal Taylor, Esq.

17 Of Counsel, Olinsky Law Group

18 IT IS SO ORDERED.

19 Dated: November 6, 2023

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23 Nancy J. Koppe
24 United States Magistrate Judge
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